

# Morgan Lewis

**Michael F. Fleming**  
Associate  
+1.212.309.6207  
michael.fleming@morganlewis.com

December 18, 2019

APPLICATION GRANTED  
SO ORDERED   
**VERNON S. BRODERICK**  
**U.S.D.J.** 12/19/2019

**Via ECF**

The Honorable Vernon S. Broderick  
United States District Court  
For the Southern District of New York  
40 Foley Square, Room 415  
New York, NY 10007

---

**Re: *Delacruz v. Target Corporation, No. 1:19-cv-09851-VSB***  
**Request to Extend Defendant's Time to Respond to Complaint**

---

Dear Judge Broderick:

We represent defendant Target Corporation ("Defendant") in the above-referenced action. Pursuant to Rules I(A) and I(G) of Your Honor's Individual Practices, we write with the consent of counsel for plaintiff Emanuel Delacruz ("Plaintiff"), respectfully to request that the Court extend Defendant's time to respond to the Complaint from January 2, 2020 to January 31, 2020. This is Defendant's second request for an extension of time to file a response to the Complaint.

Defendant previously requested an extension of time in order to permit counsel for Defendant, who had recently been engaged in this matter, to become familiar with the facts and allegations contained in the Complaint. The Court granted Defendant's request. In support of this request, counsel for Defendant states that this extension, if granted, will permit counsel additional time to prepare Defendant's response to the Complaint (which is currently due just after the New Year's holiday). If granted, this extension will not affect any other dates scheduled in this action. As noted, Plaintiff's counsel consents to this request.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,  
*/s/ Michael F. Fleming*  
Michael F. Fleming

*Attorney for Defendant*

cc: All Counsel of Record (via ECF)

**Morgan, Lewis & Bockius LLP**

101 Park Avenue  
New York, NY 10178-0060  
United States

 +1.212.309.6000  
 +1.212.309.6001